

Vernon H. Crockett  
Chief, Industrial Hazardous Waste Branch  
Land Division  
Alabama Department of Environmental Management  
1400 Coliseum Boulevard  
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection  
SMP Automotive Systems Alabama, Inc.  
EPA ID Number: ALR000061721

Dear Mr. Crockett:

On November 29, 2017, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at SMP Automotive Systems Alabama, Inc., located in Cottondale, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Apparent violations of RCRA were discovered. Please follow-up with SMP Automotive Systems Alabama, Inc. to ensure violations have been addressed.

Enclosed is a copy of the EPA inspection report. If you have any questions regarding this matter, please contact Paula Whiting, of my personnel, by phone at (404) 562-9277 or by email at [whiting.paula@epa.gov](mailto:whiting.paula@epa.gov).

Sincerely,

Alan A. Annicella  
Chief, Hazardous Waste Enforcement and  
Compliance Section  
Enforcement and Compliance Branch  
Resource Conservation and Restoration Division

Enclosure

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Adam Creamer  
Safety, Health and Environmental Engineer  
SMP Automotive Systems Alabama, Inc.  
10799 Ed Stephens Road  
Cottondale, Alabama 35453

SUBJ: RCRA Compliance Evaluation Inspection  
SMP Automotive Systems Alabama, Inc.  
EPA ID # ALR000061721

Dear Mr. Creamer:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the November 29, 2017, inspection of SMP Automotive Systems Alabama, Inc. located at 10799 Ed Stephens Road, Cottondale, Alabama. This was an EPA compliance evaluation inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Alabama Department of Environmental Management (ADEM) for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at [ [HYPERLINK "mailto:whiting.paula@epa.gov."](mailto:whiting.paula@epa.gov) ]

Sincerely,

Alan A. Annicella  
Chief, Hazardous Waste Enforcement and  
Compliance Section  
Enforcement and Compliance Branch  
Resource Conservation and Restoration Division

Enclosure

cc: Marlon McMillan, Industrial Hazardous Waste Program, ADEM Land Division

## **RCRA Inspection Report**

### **1) Inspector and Author of Report**

Paula A. Whiting  
Environmental Engineer  
U.S. Environmental Protection Agency, Region 4  
Hazardous Waste Enforcement and Compliance Section  
Enforcement and Compliance Branch  
Resource Conservation and Restoration Division  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303  
(404) 562-9277

### **2) Facility Information**

SMP Automotive Systems Alabama, Inc.  
10799 Ed Stephens Road  
Cottondale, Alabama 35453  
Tuscaloosa County  
EPA ID: ALR000061721

### **3) Responsible Official**

Adam Creamer  
Safety, Health and Environmental Engineer  
SMP Automotive Systems Alabama, Inc.  
10799 Ed Stephens Road  
Cottondale, Alabama 35453

### **4) Inspection Participants**

Adam Creamer	SMP Automotive Systems Alabama, Inc.
Marlon McMillan	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

### **5) Date and Time of Inspection**

November 29, 2017 at 9:00 a.m. CST

### **6) Applicable Regulations**

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

ADEM Administrative Code 335 Division 14

Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a) [40 C.F.R. § 262.34(a)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.03(5)(a)1.-6. [40 C.F.R. § 262.34(a)(1)-(4)] (hereinafter referred to as the “LQG Permit Exemption”).

## **7) Purpose of Inspection**

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of SMP Automotive Systems Alabama, Inc., EPA ID# ALR000061721 with the applicable regulations.

## **8) Facility Description**

The SMP Automotive Systems Alabama, Inc., Cottdale, Alabama is a manufacturer of interior and exterior plastic automotive parts exclusively for Mercedes-Benz US International, Inc. in Vance, AL.

The Cottdale facility brings in plastic pellets and gravity feeds them to heating elements for melting down. The melted pellets are extruded into injection molds for interior automotive parts (i.e., dashboards and fully assembled cockpits, center consoles, door panels and interior panels, leather and soft-surface solutions, and integration of airbags and electronic features) and exterior automotive parts (i.e., bumpers and front grilles, spoilers and rocker panels, and decorative parts and plastic based body panels.)

The molded parts are assembled and then sent to the Paint Shop for coating with primer, base coat and clear coat before baking in an oven. Depending on the automotive part, laminate and polyurethane foam is added. The final assembly and inspections are conducted prior to shipping to Mercedes-Benz.

SMP Automotive Systems Alabama, Inc. is a new facility and is currently not in full production but undergoing testing and quality control measures in anticipation of manufacturing products for Mercedes-Benz. This facility began in operation in 2017. The facility is located on 90 acres with a production area of 35 acres and 700,000 square feet under roof. The facility has 300+ employees, and currently operates eight hours a day, one shifts and five days a week.

SMP Automotive Systems Alabama, Inc.’s most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated April 7, 2017, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently SMP Automotive Systems Alabama, Inc. may generate hazardous waste streams, spent aerosol cans, used solvent, used oil, universal lamps and batteries, paint waste and other wastes which include EPA Waste Code D001, D002 and D035.

## 9) Previous Inspection History

This facility has never been inspected by the EPA or ADEM.

## 10) Findings

Upon arriving at the SMP Automotive Systems Alabama, Inc. (SMP) facility, the inspectors signed in at the security office at 9:00 a.m. CST, and then presented their credentials to Mr. Creamer at 9:30 a.m. CST.

A brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then conducted a records review.

### Records Review

The inspectors requested the training records, contingency plan, inspection records, the 2017 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated April 7, 2017.

Mr. Creamer provided his training certificate for the Advanced Hazardous Waste Management Training course taken on April 27, 2016. The inspectors requested Mr. Creamer will provide his 2017 Department of Transportation HazMAT certificate via email. The inspectors advised Mr. Creamer since he is new to his position to obtain his annual hazardous waste training before the end of 2017 to remain in compliance.

The inspectors requested the Contingency Plan. Mr. Creamer stated that the emergency response plan which will encompass the contingency plan is being drafted. The inspectors advised Mr. Creamer that once the facility is full production by August 2018, the contingency plan and its components must be fully implemented.

The inspectors requested the weekly inspection logs for the hazardous waste storage area. Mr. Creamer provided records from May 2017 to July 2017 and October 2017 to November 2017. The inspectors asked why mid-July to October 2017 was missing records and Mr. Creamer stated that the hazardous waste storage area was empty and no inspections were conducted. The inspectors advised that the regulations require that inspections be conducted weekly to ensure the hazardous waste storage area remains in compliance and that no unknown and unattended materials be placed in the area without prior knowledge.

**Pursuant to ADEM Admin. Code r. 335-14-3-.03(5)(a)1.(i) [40 C.F.R. § 262.34(a)(1)(i)], which incorporates ADEM Admin. Code r. 335-14-6-.09(5) [40 C.F.R. § 265.174], and is a condition of the LQG Permit Exemption, a generator is required to, at least weekly, inspect areas where containers are stored looking for leaking containers and for deterioration of containers caused by corrosion or other factors.**

Hazardous and non-hazardous manifests were reviewed for 2017. Hazardous wastes were shipped to Allworth, LLC (EPA ID ALD094476793) in Birmingham, AL. The land disposal restriction forms were reviewed.

Non-hazardous waste water based solvent was shipped to Valicor Environmental Services, LLC (EPA ID ALR000052019) in Huntsville, AL.

The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

### **10.1 Assembly**

The tour began in Assembly. The inspectors observed that the production space was still being set up, however some equipment had been established to produce sample products for testing and quality control. The tour then proceeded to Interior Assembly where door panels are laminated with faux leather material. The inspectors observed finished interior door panels to be shipped to Mercedes for inspecting. The tour then moved to the Paint Line where the mold part is placed on a conveyor system and power washed with a degreaser, dried. The part is sent to a gas-fired heat booth to ensure the primer adheres to the plastic and then primer, base coat and clear coat are applied before the part is sent to the ovens before exiting the system.

Mr. Creamer explained that the filters from the clear coat paint booth was tested and the results stated that the used filters were non-hazardous.

A small pile of black extruded material was observed on the floor. Mr. Creamer stated that the equipment vendor was coming to add a mobile tray to capture the extruded material. The tray will also keep the material from collecting on the floor and becoming dirty before it is sent out for grinding and reselling by Jet Polymer in Fort Payne, AL.

No hazardous waste was observed in the Assembly areas or on the Paint Line.

### **10.2 Paint Storage**

The Paint Storage contained racks of paint product to be used in sample runs and quality control analyses. In the rear of the room was the less than 90-day hazardous waste storage area (Pictures 1-5). The inspectors observed seven 320-gallon totes of flammable liquid waste with the oldest date being September 15, 2017; and 7 55-gallon drums of waste rags and filters and 7 55-gallon drums of flammable liquid. The oldest drum was dated September 15, 2017. All containers were closed, labeled and dated. The drums were separated to create access aisle space and allow each label to be observed. No issues were observed in this area.

## **11) Summary**

The inspectors conducted the exit meeting with Mr. Creamer. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. SMP Automotive Systems Alabama, Inc. was inspected as a large quantity generator of hazardous waste. At the time of the inspection, SMP Automotive Systems Alabama, Inc. did not appear to be in compliance with some requirements of RCRA.

**Follow Up Responses from SMP Automotive Systems Alabama, Inc.**

**12) Signed**

\_\_\_\_\_  
Paula A. Whiting,  
Environmental Engineer

\_\_\_\_\_  
Date

**Concurrence**

\_\_\_\_\_  
Alan A. Annicella, Chief  
Hazardous Waste Enforcement and Compliance Section  
Enforcement and Compliance Branch  
Resource Conservation and Restoration Division

\_\_\_\_\_  
Date

**ATTACHMENT A**

**SMP AUTOMOTIVE SYSTEMS ALABAMA, INC.**

**COTTONDALE, ALABAMA**

**COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS**

**NOVEMBER 29, 2017**





Picture [ SEQ Picture \\* ARABIC ] – Less than 90 Day  
Hazardous Waste Storage Area



Picture [ SEQ Picture \\* ARABIC ] – Less than 90 Day  
Hazardous Waste Storage Area



Picture [ SEQ Picture \\* ARABIC ] – Less than 90 Day  
Hazardous Waste Storage Area



Picture [ SEQ Picture \\* ARABIC ] – Less than 90 Day  
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